

Notice of Service of Process

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Transmittal Number: 22361591 Date Processed: 11/30/2020

Primary Contact: Gene Funk

Cowan Systems, LLC 4555 Hollins Ferry Rd Baltimore, MD 21227-4610

Electronic copy provided to: Christine Morris

Entity: Cowan Equipment Leasing, LLC

Entity ID Number 2938512

Entity Served: Cowan Equipment Leasing, LLC

Title of Action: Volodymyr Lohmotov vs. Alan Blais

Document(s) Type: Summons/Complaint

Nature of Action: Personal Injury

Court/Agency: Middlesex County Superior Court, MA

Case/Reference No:2081CV2445Jurisdiction Served:MarylandDate Served on CSC:11/25/2020Answer or Appearance Due:20 Days

Originally Served On: CSC

How Served: Personal Service
Sender Information: Matthew J. Holmes 508-795-1601

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com

Commonwealth of Massachusetts

MIDDLESEX,SS.

TRIAL COURT OF THE COMMONWEALTH SUPERIOR COURT DEPARTMENT CIVIL DOCKET NO. 2081CV2445

	VOLODYMYR	LOHMOT	COA	, PLAII	NTIFF(S),		(KR10)
LAN	BLAIS AND	COWAN	EQUIPMENT	LEASING, LL	C ENDANT(S	S)	
					;	SUMMONS	

COWAN EQUIPMENT LEASING, LICEnterdant's name) THIS SUMMONS IS DIRECTED TO

You are being sued. The Plaintiff(s) named above has started a lawsuit against you. A copy of the Plaintiff's Complaint filed against you is attached to this summons and the original complaint has been filed in the MIDDLESEX SUPERIOR Court. YOU MUST ACT PROMPTLY TO PROTECT YOUR RIGHTS.

- You must respond to this lawsuit in writing within 20 days. If you do not respond, the court may decide 1. the case against you and award the Plaintiff everything asked for in the complaint. You will also lose the opportunity to tell your side of the story. You must respond to this lawsuit in writing even if you expect to resolve this matter with the Plaintiff. If you need more time to respond, you may request an extension of time in writing from the Court.
- How to Respond. To respond to this lawsuit, you must file a written response with the court and mail a 2. copy to the Plaintiff's Attorney (or the Plaintiff, if unrepresented). You can do this by:
- Filing your signed original response with the Clerk's Office for Civil Business, MIDDLESEX Court, 00 TRADE CENTER, WOBURN, Maddol & D. Iby mail or in person, AND
 - Delivering or mailing a copy of your response to the Plaintiff's Attorney/Plaintiff at the following address:

 RICHARD J. RAFFERTY, 238 SHREWSBURY ST., WORCESTER, MA 01604 EDEN RAFFERTY
 - What to include in your response. An "Answer" is one type of response to a Complaint. Your Answer 3. must state whether you agree or disagree with the fact(s) alleged in each paragraph of the Complaint. Some defenses, called affirmative defenses, must be stated in your Answer or you may lose your right to use them in court. If you have any claims against the Plaintiff (referred to as counterclaims) that are based on the same facts or transaction described in the Complaint, then you must include those claims in your Answer. Otherwise, you may lose your right to sue the Plaintiff about anything related to this lawsuit. If you want to have your case heard by a jury, you must specifically request a jury trial in your Answer or in a written demand for a jury trial that you must send to the other side and file with the court no more than 10 days after sending your Answer. You can also respond to a Complaint by filing a "Motion to Dismiss," if you believe that the complaint is legally invalid or legally insufficient. A Motion to Dismiss must be based on one of the legal deficiencies or reasons listed under Mass. R. Civ. P. 12. If you are filing a Motion to Dismiss, you must also comply with the filing procedures for "Civil Motions" described in the rules of the Court in which the complaint was filed, available at www.mass.gov.courts/case-legal-res/rules of court.

Required information on a		
4. Legal Assistance. You may wish to get legal help from a lawyer. If you cannot information for people who represent themselves is available at www.mass.gov/c Required information on all fillings: The "civil docket number" appearing at the case number assigned to this case and must appear on the front of your Answer You should refer to yourself as the "Defendant." Witness Hon. Judith Fabricant, Chief Justice on	ear on the front of your Answer or Motion to Dis	
Witness Hon. Judith Fabrica	ant, Chief Justice on_	, 20
Hickory Si	1 Suli	
	The second and the se	
		-Magistrate at the beginning of the lawsuit should be indi
annulous pelole if is selved our f	ne Delendant.	
together with a copy of the o	complaint in this action	n, on the defendant named in this summons, in t
Dated:	, 20	Signature:
	ER:	
N.B. TO PROCESS SERV		
PLEASE ENTER THE		
PLEASE ENTER THE		
PLEASE ENTER THE		

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS.

MIDDLESEX SUPERIOR COURT CIVIL ACTION NO.: 2081cv2445

VOLODYMYR LOHMOTOV
Plaintiff

v.

PLAINTIFF'S COMPLAINT AND JURY TRIAL DEMAND

ALAN BLAIS and COWAN EQUIPMENT LEASING, LLC Defendants

PARTIES

- 1. The plaintiff, Volodymyr Lohmotov, is an individual residing at 12304 Moran Street, Hamtramck, MI 48212.
- 2. The defendant, Alan Blais, is an individual residing at 140 Bailey Street, Woonsocket, RI 02895.
- 3. The Defendant Cowan Equipment Leasing, LLC is a foreign corporation with a principal place of business located at 4555 Hollins Ferry Road, Baltimore, MD 21227.

FACTS

- 4. The Plaintiff repeats and realleges the preceding paragraphs as if expressly set forth fully hereinafter.
- 5. On or about January 22, 2018, the plaintiff was parked in the Framingham Service Plaza, I-90 Westbound, in the tractor trailer parking area, sleeping in the sleeping cabin of his tractor trailer, when the defendant Alan Blais, operating a motor vehicle belonging to the defendant Cowan Equipment Leasing, LLC, crashed into plaintiff's vehicle and another nearby vehicle.
- 6. On or about January 22, 2018, the defendant, Alan Blais, failed to use care and caution when he failed to stop his vehicle prior to striking two parked vehicles.
- 7. As a result of the accident the plaintiff, was seriously injured.
- 8. Pursuant to M.G.L. c. 223A § 3(c) jurisdiction is proper because this accident occurred in Middlesex County.

COUNT I - NEGLIGENCE

(Volodymyr Lohmotov v. Alan Blais)

- 9. The Plaintiff repeats and realleges the preceding paragraphs as if expressly set forth fully hereinafter.
- 10. On January 22, 2018, the defendant, Alan Blais, so carelessly and negligently operated a motor vehicle causing it to collide with the parked vehicle with the plaintiff inside.
- 11. As a direct and proximate result of the negligence of the defendant, Alan Blais, the plaintiff, was greatly injured, suffered conscious pain and suffering of body and mind, and was restricted in her vocational and avocational activities.

WHEREFORE, the plaintiff, Volodymyr Lohmotov demands judgment against the defendant, Alan Blais, plus costs and interest.

COUNT II - NEGLIGENT ENTRUSTMENT

(Volodymyr Lohmotov v. Cowan Equipment Leasing, LLC)

- 12. The Plaintiff repeats and realleges the preceding paragraphs as if expressly set forth fully hereinafter.
- 13. The defendant, Cowan Equipment Leasing, LLC, is responsible for the actions of the operators of its motor vehicle.
- 14. On or about January 22, 2018, the defendant, Cowan Equipment Leasing, LLC, gave the defendant, Alan Blais, permission to operate its motor vehicle.
- 15. On or about January 22, 2018, the defendant, Cowan Equipment Leasing, LLC, owed a duty to the plaintiff, Volodymyr Lohmotov, to ensure that the operator of their vehicle exercised proper operation of his motor vehicle, and failed to do so as the defendant, Alan Blais, negligently operated his motor vehicle causing it to collide with parked vehicle with the plaintiff inside.
- 16. As a direct and proximate result of the negligence of the defendant, Cowan Equipment Leasing, LLC, the plaintiff, Volodymyr Lohmotov, suffered personal injuries requiring medical attention, great pain of the body and main, and has been restricted in his vocational and avocational activities.

WHEREFORE, the plaintiff, Volodymyr Lohmotov demands judgment against the defendant, Cowan Equipment Leasing, LLC, plus costs and interest.

COUNT III - NEGLIGENCE

(Volodymyr Lohmotov v. Cowan Equipment Leasing, LLC)

- 17. The Plaintiff repeats and realleges the preceding paragraphs as if expressly set forth fully hereinafter.
- 18. The defendant, Cowan Equipment Leasing, LLC, is responsible for the actions of the operators of its vehicle.
- 19. On January 22, 2018, the defendant, Cowan Equipment Leasing, LLC, owed a duty to the plaintiff, Volodymyr Lohmotov, to properly train, guard against, and warn of the existence of the dangerous condition, which was created by the operator of its vehicle, Alan Blais, relative to his negligent operation.
- 20. As a direct and proximate result of the negligence of the defendant, Cowan Equipment Leasing, LLC, the plaintiff, Volodymyr Lohmotov, suffered serious injuries requiring medical attention, great pain of the body and mind, and has been restricted in his vocational and avocational activities.

WHEREFORE, the plaintiff, Volodymyr Lohmotov demands judgment against the defendant, Cowan Equipment Leasing, LLC, plus costs and interest.

PLAINTIFF DEMANDS A TRIAL BY JURY ON ALL ISSUES SO TRIABLE.

Volodymyr Lohmotov By His Attorneys,

/s/ Matthew J. Holmes
Richard J. Rafferty, Esquire, BBO #551944
Matthew J. Holmes, Esquire, BBO#675994
Eden Rafferty
238 Shrewsbury Street
Worcester, MA 01604
(508) 795-1601

Dated: October 8, 2020

CIVIL ACTION COVER SHEET	DOCKET NUMBER	,	Trial Court of Massac The Superior Court	chusetts		
PLAINTIFF(S): VOLODYMYR LOHMOTOV			COUNTY Middlesex			
ADDRESS:				· · · · · · · · · · · · · · · · · · ·		
12304 Moran Street, Hamtramck, MI 48212		DEFENDANT(S): ALAN BLAIS and				
		COWAN EQUIPMENT LEA	ASING, LLC			
ATTORNEY: Matthew J. Holmes						
ADDRESS: Eden Rafferty		ADDRESS:				
238 Shrewsbury Street, Worcester, MA 01604		A. Blais - 140 Bailey Street	t, Woonsocket, RI 02895			
		Cowan - 4555 Hollins Ferry	y Road, Baltimore, MD 21227			
BBO: 675994						
		K DESIGNATION (see	reverse side)			
CODE NO. TYPE OF ACTION B03 Motor Vehicle Tort	ON (specify)	TRACK F	HAS A JURY CLAIM BEEN	MADE?		
		<u> </u>	X YES NO			
*If "Other" please describe:						
Is there a claim under G.L. c. 93A? YES NO		ls this a cla ☐ YE	ass action under Mass. R. Civ. P. 23? ES X NO			
	MENT OF DAMAGES	PURSUANT TO G.L.	<u> </u>			
The following is a full, itemized and detailed statement of For this form, disregard double or treble damage claims;	the facts on which the	e undersigned plaintiff o	-	money damages.		
	TC	ORT CLAIMS				
A. Documented medical expenses to date:		nal sheets as necessar	y)			
Total hospital expenses				₫bd		
Total doctor expenses				tbd		
Total chiropractic expenses Total physical therapy expenses				∯bd		
5. Total other expenses (describe below)				\$pd ಕು0,000		
			Subtotal (A):	Ψ		
B. Documented lost wages and compensation to date				\$100,000		
C. Documented property damages to date D. Reasonably anticipated future medical and hospital ex	nenses		••••••	\$ \$		
E. Reasonably anticipated lost wages				\$100,000		
F. Other documented items of damages (describe below)				\$		
G. Briefly describe plaintiff's injury, including the nature a						
Neck, back, left ankle, concussion/post concussion synd	rome		TOTAL (A-F):\$250,000		
This action includes a claim involving collection of a	(attach additional	CT CLAIMS sheets as necessary) nt to a revolving credit	agreement. Mass. R. Civ. P. 8.1(a).			
Provide a detailed description of claim(s):			TOTAL:	\$		
		_ ,		<u> </u>		
Signature of Attorney/ Unrepresented Plaintiff: RELATED ACTIONS: Please provide the case nur	x Matthe	w). Holm	Date: Oc	t 8, 2020		
RELATED ACTIONS: Please provide the case nur	mber, case name, a	and county of any rela	ated actions pending in the Superio	r Court.		
CERT	TIFICATION PURS	UANT TO SJC RULI	F 1·18			
I hereby certify that I have complied with requireme Rule 1:18) requiring that I provide my clients with ir advantages and disadvantages of the various meth	ents of Rule 5 of the information about co	Supreme Judicial Curt-connected disput	ourt Uniform Rules on Dispute Res			
Signature of Attorney of Record: X	Watthour	Q. Holmes	Date: Oc	t 8, 2020		

Case 1:20-cy-12248-ADB. Document 1-1 Filed 12/18/20 Page 8 of 9 CIVIL ACTION COVER SHEET INSTRUCTIONS SELECT CATEGORY THAT BEST DESCRIBES YOUR CASE

AC Actions Involving the Sta	te/Municipality *	ER Equitable Remedies			RP Real Property		
AA1 Contract Action involving C	Commonwealth.	D01 Specific Perform	nance of a Contract	(A)	C01 Land Taking	(F)	
Municipality, MBTA, etc.	(A)	D02 Reach and App		(F)	C02 Zoning Appeal, G.L. c. 40A	(F)	
AB1 Tortious Action involving C		D03 Injunction		(F)	C03 Dispute Concerning Title	(F)	
Municipality, MBTA, etc.	(A)	D04 Reform/ Cancel		(F)	C04 Foreclosure of a Mortgage	(X)	
AC1 Real Property Action invol		D05 Equitable Reple		(F)	C05 Condominium Lien & Charges	(X)	
Commonwealth, Municipal AD1 Equity Action involving Co		D06 Contribution or		(F) (A)	C99 Other Real Property Action	(F)	
Municipality, MBTA, etc.	(A)	D07 Imposition of a D08 Minority Shareh		(A) (A)	MC Miscellaneous Civil Actions		
AE1 Administrative Action invol			Contractual Relationship	(F)	MO IMPOUNDING		
Commonwealth, Municipal		D10 Accounting		(A)	E18 Foreign Discovery Proceeding	(X)	
,	,, , ,		Restrictive Covenant	(F)	E97 Prisoner Habeas Corpus	(X)	
CN Contract/Busines	s Cases	D12 Dissolution of a	Partnership	(F)	E22 Lottery Assignment, G.L. c. 10, § 28	(X)	
			lgment, G.L. c. 231A	(A)			
A01 Services, Labor, and Mater		D14 Dissolution of a		(F)	AB Abuse/Harassment Prevention		
A02 Goods Sold and Delivered	(F)	D99 Other Equity Ad	tion	(F)		~~	
A03 Commercial Paper	(F)				E15 Abuse Prevention Petition, G.L. c. 209A (X)		
A04 Employment Contract	(F)	PA Civil Actions In	volving Incarcerated Pa	<u>rty</u> †	E21 Protection from Harassment, G.L. c. 256	3E(X)	
A05 Consumer Revolving Cred					AA Administrative Civil Actions		
A06 Insurance Contract A08 Sale or Lease of Real Esta	(F) ite (F)	PA1 Contract Action	involving an		AA Administrative Civil Actions		
A12 Construction Dispute	(A)	Incarcerated Pa	arty	(A)	E02 Appeal from Administrative Agency,		
A14 Interpleader	(F)	PB1 Tortious Action			G.L. c. 30A	(X)	
BA1 Governance, Conduct, Inte		Incarcerated Pa	•	(A)	E03 Certiorari Action, G.L. c. 249, § 4	(X)	
Affairs of Entities	(A)	PC1 Real Property A			E05 Confirmation of Arbitration Awards	(X)	
BA3 Liability of Shareholders, D		Incarcerated Pa		(F)	E06 Mass Antitrust Act, G.L. c. 93, § 9	(A)	
Officers, Partners, etc.	(A)	PD1 Equity Action in		(E)	E07 Mass Antitrust Act, G.L. c. 93, § 8	(X)	
BB1 Shareholder Derivative	(A)	Incarcerated Pa	•	(F)	E08 Appointment of a Receiver	(X)	
BB2 Securities Transactions	(A)	PE1 Administrative		/ E\	E09 Construction Surety Bond, G.L. c. 149,		
BC1 Mergers, Consolidations, S	Sales of	Incarcerated Pa	arty	(F)	§§ 29, 29A	(A)	
Assets, Issuance of Debt,			TR Torts		E10 Summary Process Appeal	(X)	
BD1 Intellectual Property	(A)		TK TOILS		E11 Worker's Compensation	(X)	
BD2 Proprietary Information or		B03 Motor Vehicle N	legligence - Personal		E16 Auto Surcharge Appeal	(X)	
Secrets	(A)	Injury/Property	• •	(F)	E17 Civil Rights Act, G.L. c.12, § 11H	(A)	
BG1 Financial Institutions/Fund	٠,	B04 Other Negligen	ce - Personal	` '	E24 Appeal from District Court	(X)	
BH1 Violation of Antitrust or Tra		Injury/Property		(F)	Commitment, G.L. c.123, § 9(b) E25 Pleural Registry (Asbestos cases)	(^)	
Regulation Laws A99 Other Contract/Business A	(A)	B05 Products Liabilit	ty	(A)	E94 Forfeiture, G.L. c. 265, § 56	(X)	
Ass Office Confidendusiness A	ction - Specify (1)	B06 Malpractice - M	edical	(A)	E95 Forfeiture, G.L. c. 94C, § 47	(F)	
		B07 Malpractice - O		(A)	E99 Other Administrative Action	(x)	
* Choose this case type if ANY		B08 Wrongful Death	- Non-medical	(A)	Z01 Medical Malpractice - Tribunal only,	(-7	
Commonwealth, a municipality,		B15 Defamation		(A)	G.L. c. 231, § 60B	(F)	
other governmental entity UNLI		B19 Asbestos	01- 0 5-11	(A)	Z02 Appeal Bond Denial	(X)	
case type listed under Administ	rative Civil Actions	B20 Personal Injury	- Siip & Faii	(F)			
(AA).		B21 Environmental B22 Employment Dia	ecrimination	(F) (F)	SO Sex Offender Review		
+ Change this case type if ANV	portu io on	BE1 Fraud, Busines		(F) (A)			
† Choose this case type if ANY incarcerated party, UNLESS yo		B99 Other Tortious	•	(F)	E12 SDP Commitment, G.L. c. 123A, § 12	(X)	
type listed under Administrative		Doo Galor Tordious?	100011	(,)	E14 SDP Petition, G.L. c. 123A, § 9(b)	(X)	
or is a Prisoner Habeas Corpus		RP Summary Process (Real Property)			RC Restricted Civil Actions		
		S01 Summary Proce	ess - Residential	(X)	E40 Com Official and David Colon Colon Colon	11.00	
		S02 Summary Process - Commercial/		v 7	E19 Sex Offender Registry, G.L. c. 6, § 178		
				(F)	E27 Minor Seeking Consent, G.L. c.112, § 1	25(X)	
	TR		ECTION TO THE FA				
EXAMPLE:							
	TVDE OF 407	10N (anas:5-)	TDACK	UACA!	LIDV CLAIM DEEN MADES		
CODE NO. TYPE OF AC		ION (specify)	TRACK	X YES	URY CLAIM BEEN MADE?		
DO3 M	otor Vohiola Magligano	e Dersonal Injury	F				

STATEMENT OF DAMAGES PURSUANT TO G.L. c. 212, § 3A

DUTY OF THE PLAINTIFF - The plaintiff shall set forth, on the face of the civil action cover sheet (or attach additional sheets as necessary), a statement specifying the facts on which the plaintiff relies to determine money damages. A copy of such civil action cover sheet, including the statement as to the damages, shall be served with the complaint. A clerk-magistrate shall not accept for filing a complaint, except as otherwise provided by law, unless it is accompanied by such a statement signed by the attorney or self-represented litigant.

DUTY OF THE DEFENDANT - If the defendant believes that the statement of damages filed by the plaintiff is inadequate, the defendant may file with his/her answer a statement specifying the potential damages which may result if the plaintiff prevails.

A CIVIL COVER SHEET MUST BE FILED WITH EACH COMPLAINT.
FAILURE TO COMPLETE THIS COVER SHEET THOROUGHLY AND ACCURATELY
MAY RESULT IN DISMISSAL OF THIS ACTION.

COWAN EQUIPMENT LEASING, LLC: W05755095

♠ Notice



Scheduled Maintenance

Due to routine maintenance, the following services will be unavailable on November 24th between 9pm and 12 midnight EST:

- 1. Business Entity Search & Document Order
- 2. Annual Report/Personal Property Tax Filings
- 3. Any amendment to an exisiting business such as Articles of Cancellation for a Maryland LLC, Resolution to Change Principal Office/Resident Agent, Reinstatements, Revivals, etc.
- 4. Articles of Incorporation for a Religious Corporation

You may still Register a Business and/or Trade Name using the online system. Thank you.

Department ID Number:

W05755095

Business Name:

COWAN EQUIPMENT LEASING, LLC

Principal Office:

4555 HOLLINS FERRY ROAD

BALTIMORE MD 21227

Resident Agent:

CSC-LAWYERS INCORPORATING SERVICE COMPAN

7 ST. PAUL STREET

SUITE 820

BALTIMORE MD 21202

Status:

ACTIVE

Good Standing:

THIS BUSINESS IS IN GOOD STANDING

Business Type:

DOMESTIC LLC

Business Code:

20 ENTITIES OTHER THAN CORPORATIONS

Date of Formation/Registration:

04/12/2000

State of Formation:

MD